



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
WATER

JUN 13 1989

MEMORANDUM

SUBJECT: Development of State NPDES General Permit Programs

FROM: *Cynthia Dougherty*  
Cynthia Dougherty, Director  
Permits Division (EN-336)

TO: Water Management Division Directors  
NPDES State Directors

The Permits Division is seeking to increase State interest in general permit authority. We have taken several steps to increase the availability of information concerning State general permit programs and to simplify the process of obtaining program authority. In February 1988, the Permits Division issued the General Permit Program Guidance and today we are distributing the attached program authorization summary. We believe NPDES States should review this information and consider adding this key element to their NPDES programs.

The General Permit Program Guidance (Guidance) was issued to provide a streamlined approach to the general permit process. The goal was to provide a centralized source of information about the general permit process and obtaining general permit authority, and to simplify the existing procedures for the development and oversight of general permits. We have found, however, that questions still remain regarding the State program approval process. To address these concerns, we are issuing the attached package on the State general permit program approval process.

A prime example of where general permits can be very useful is in dealing with stormwater discharges. As you are aware, on December 7, 1988, EPA proposed regulations covering stormwater discharges associated with industrial activity. One of the most frequently asked questions at each of six public meetings conducted during the comment period concerned general permit application. General permit authority is a key program element or successful implementation of the stormwater group application

process and may be essential for dealing with large numbers of stormwater permit applications for construction activities. The ability to employ general permits will become even more important when the stormwater moratorium ends in October 1992 and all other stormwater point sources will be subject to permit requirements.

The attached State General Permit Program Development summary describes the approval process and the necessary requirements which must be met prior to approval of a State general permit program. The cover document briefly explains these requirements. The package also includes model documents which can be used to develop a submission for general permit authority, as well as a copy of the federal general permit regulations and the Guidance. These materials are provided with the intent to facilitate and promote consistency in the development of general permit programs.

The Permits Division remains committed to assisting interested States in obtaining general permit approval. We urge NPDES States without general permit programs to carefully consider the benefits of receiving authorization to issue general permits.

If you have any questions regarding general permits or the approval process, please call me (FTS/202 475-9545) or have your staff contact Kevin Smith (FTS/202 475-9516) of this office.

Attachments